

## **EXHIBIT 4**

# Holland & Knight

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August 19, 2023

## Via Email

Mr. Jason P. Gottlieb  
Mr. David E. Ross  
Mr. Alexander R. Yarm  
Morrison Cohen LLP  
909 Third Avenue  
New York, New York 10022-4784

Re: *SEC v. Digital Licensing, Inc.* Case No. 2:23-cv-00482-RJS (D. Utah)

Dear Jason, David, and Alex:

On behalf of Receiver Joe Dewey, we direct your clients to provide information responsive to each of the below requests as promptly as possible, and they provide the Receiver **on or before 5 PM Central on Tuesday, August 22, 2023** a proposed timeline and plan for promptly completing the turnover of all responsive materials, all of which are required in order to comply with the Court's orders in this action. We have previously requested several of these items but are including as a reminder of outstanding obligations and for ease of reference. Please note that, as used herein (other than in Request No. 1), DLI means Digital Licensing Inc. and all subsidiaries, affiliates, and all associated d/b/a and f/k/a.

1. A list of all entities and individuals who were or are subsidiaries or affiliates of DLI, as those terms are commonly used.
  - a. This request includes, but is not limited to, parties named in *SEC v. Digital Licensing Inc.*, 2:23-cv-00482-RJS (the "Litigation"). For instance, if "Company X" is a known affiliate but is not listed as a party in the Litigation, you should still include it in your response.
  - b. For each entity, please include the following:
    - i. the basis for concluding that it is/was a subsidiary or affiliate;
    - ii. the entity's EIN / tax identification number, registered agent, officers, members/shareholders, and directors;
    - iii. whether the entity has employees (and if so, who), and the physical address(es) for each such entity's operations and receipt of mail; and
    - iv. if an entity conducts or conducted business from an office location, provide contact information for any landlord, building management, or the like.
  - c. For individuals, please include the following information:

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- i. the basis for concluding that they are/were an affiliate (officer, director, control person, etc.); and
  - ii. the role and responsibilities each such person had vis-à-vis DLI.
- d. For all identified subsidiaries and affiliates, also include the approximate sum of fiat or digital asset sent/provided/received/transferred to or from DLI by same.
2. All documents of DLI—including books, records, and communications, of DLI. This specifically includes, but is not limited to, documents responsive to the requests enumerated below.
3. DLI's financial statements and any other documents sufficient to identify all of DLI's assets and liabilities.
4. A complete list of all bank, brokerage, and digital asset accounts controlled by DLI or to which DLI has, or at any time has had, access.
5. A complete list of all individuals who at any time have acted on or for DLI's behalf including, but not limited to, entering into agreements or negotiating transactions for DLI.
6. A complete list of DLI employees, contractors, agents, and representatives throughout the relevant period identified in the above-captioned action.
  - a. For each individual, please include their name, relationship, title, role, and contact information,
7. Documents sufficient to identify each and every oil and gas interest<sup>1</sup>, of any kind, in any location, that DLI has, or contends it has, or has had during the relevant period identified in the above-captioned case including, but not limited to, contracts, communications and correspondence, invoices, receipts, payment records, title documents, lease documents, royalty documents, legal files, memoranda of understanding, letters of interest, letters of intent, insurance policies, transactional agreements and drafts thereof, employee lists, research and production records, regulatory filings, current or former vendor and service provider agreements and contact information.<sup>2</sup>
8. Contact information and copies of any agreements with services providers who are supplying or historically have supplied hosting, domain listing, and/or related support services relating to [www.TheDebtBox.com](http://www.TheDebtBox.com), [www.DigitalLicensingInc.com](http://www.DigitalLicensingInc.com), [www.DigitalCommodityHouse.com](http://www.DigitalCommodityHouse.com), [Debt.store](http://Debt.store), and any other website related to DLI.
  - a. For each of the aforementioned, provide the name of the person or entity in whose name the account is registered as well as login credentials.
9. All account identifying information, and current/last known login credentials, for every email or other communications channel (SnapChat, Discord, Telegram, YouTube, etc.) used by DLI or its

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<sup>1</sup> Including, but not limited to, ownership of equipment, mineral interests, working interests, royalty interests, drilling or operation rights, and the like.

<sup>2</sup> The Receiver cannot and will not take a position on whether DLI owns, or has any legal interests in, any oil and gas properties until such time as it is able to recover from your clients (and others as may be warranted) the information necessary to make such an assessment. Notwithstanding your production of select limited materials and iterative correspondence this week, your clients cannot unilaterally direct, allow, authorize, or require the Receiver to take any action with regard to purported DLI oil and gas interests or those purportedly belonging to any other entity or individual. This is especially true in light of pending litigation relating to the ownership and control of such interests.

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representatives or by any of your clients about DLI matters. This specifically includes Gmail and other email accounts used to communicate about DLI matters.

10. A list of every lawyer or law firm engaged to provide legal services to or for DLI of any kind, at any time, on any issue.
11. A list of all pending litigation, arbitration, and mediation matters to which DLI is (or was) a party, whether plaintiff, defendant, nominal, or otherwise, regardless of whether the matter occurred within or outside the United States. For each matter, please include the following
  - a. Case name;
  - b. Case number;
  - c. Court;
  - d. Counsel, with associated contact information; and
  - e. A summary of the matter and current status.
12. A list of all judgments or liens entered against DLI, or on its behalf against another, in the last two years. This request specifically includes, but is not limited, to Case No. A-20-820260-C, *DIG CCP LLC v. Bullion of Nevada, LLC, et al.*, in which a judgment was entered - and recently resolved - against Bullion and Schad Brannon. For each judgment or lien, please include:
  - a. Information sufficient to identify the judgment or lien; and
  - b. A summary of underlying facts or proceedings relating to same.
13. Copies and/or a list of all known existing contractual relationships or agreements - written or unwritten - between DLI and any entity or individual. This includes, but is not limited to
  - a. Investor or customer agreements; and
  - b. Lending agreements; and
  - c. Notes; and
  - d. Merger or purchase and sale agreements; and
  - e. LLC agreements; and
  - f. License or licensing agreements; and
  - g. Lease agreements; and
  - h. All agreements with parties purportedly connected to the projects identified on [www.thedebtbox.com/projects](http://www.thedebtbox.com/projects).
14. Information sufficient to identify the source of proceeds used to purchase all of your clients' vehicles (cars, boats, etc.) and real properties (primary residence, vacation homes, rental properties, undeveloped land, mineral interests, etc.), and all contracts and receipts of purchase relating to same.

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15. A complete DLI investor or customer list.

In addition to the foregoing, we would like the opportunity to interview your clients – individually - in person or virtually. Please let us know **on or before 5 PM Central on Tuesday, August 22, 2023** if your clients will agree or decline to be interviewed.

As ever, do not hesitate to contact us with any questions or concerns.

Respectfully,

**HOLLAND & KNIGHT LLC**



Jessica B. Magee

cc: Mr. Josias Dewey  
Mr. Scott Mascianica  
Mr. Alex M. Englander